



Department of Energy & Environmental Protection  
Bureau of Water Protection and Land Reuse  
Remediation Division  
79 Elm Street, Hartford, CT 06106-5127  
(860) 424-3705 [www.ct.gov/deep/remediation](http://www.ct.gov/deep/remediation)

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## **INSTRUCTIONS FOR COMPLETION OF A BRRP BROWNFIELDS REMEDIATION & REVITALIZATION PROGRAM INTERIM VERIFICATION FORM (DEEP-LEP-VER-Interim-BRRP)**

Pursuant to the Property Transfer Law, Section 22a-134(28) of the Connecticut General Statutes (CGS), an "Interim Verification" is a written opinion rendered by an environmental professional, licensed pursuant to Section 22a-133v of the Connecticut General Statutes (CGS) on a form prescribed by the Commissioner. The BRRP Interim Verification Form is the prescribed form.

The purpose of the Brownfields Remediation & Revitalization Program BRRP Interim Verification Form is to document the written opinion of an LEP that an investigation of a specific brownfield property has been completed in accordance with prevailing standards and guidelines - including but not limited to the Site Characterization Guidance Document (SCGD), and that remediation has been completed in accordance with the Remediation Standard Regulations (RSRs), Section 22a-133k-1 through 3 of the Regulations of Connecticut State Agencies, with the exception that a selected remedy for groundwater pollution is in operation but has not achieved the remediation standards for groundwater; and the verification identifies:

- the long-term remedy that is being implemented
- the estimated duration of the remedy;
- the ongoing operation and maintenance requirements of the remedy; and
- There are no current exposure pathways to the groundwater that have not yet met the remediation standards.

Compliance groundwater monitoring is not considered groundwater remediation, and therefore would not be applicable to a BRRP Interim Verification scenario.

The BRRP Interim Verification Form is essentially a checklist of all requirements and provisions in the RSRs and the expected quantity and quality of information to apply the requirements and provisions of the RSRs. Details of the LEP's application of all requirements and provisions used to achieve compliance with the RSRs are to be presented in the Remedial Action Report. It is incumbent upon the LEP and eligible party to be familiar with specific requirements and/or expectations of site characterization and the application of the RSRs.

There are checkboxes related to the completion of site characterization and the LEP's expected level of understanding of site conditions. All applicable checkboxes should be marked. There are also specific references to all sections in the RSRs. All provisions used to achieve compliance with each criterion are to be marked. The Department of Energy and Environmental Protection (the "Department") advises that each referenced RSR section be reviewed prior to completing the BRRP Interim Verification Form to ensure the application of each provision marked as being used to achieve compliance has been properly applied.

The BRRP Interim Verification Form is inclusive of all releases applicable to the verification. Therefore, certain provisions may be applicable to more than one (1) release area. The BRRP Interim Verification Form includes space to identify the applicable release areas for each application.

The BRRP Interim Verification Form and all attached documents should be submitted to:

Remediation Division, 2nd Floor  
Bureau of Water Protection and Land Reuse  
Department of Environmental Protection  
79 Elm Street, Hartford, CT 06106 - 5127

All verification forms undergo an administrative completeness review upon receipt. A complete verification form will include the Remedial Action Report. Incomplete verification forms will either be: (1) not processed until complete, (2) or the verification will be rejected, or (3) the verification will be flagged for audit. The Department's response actions will be evaluated on a case-by-case assessment.

### **General Information**

**Applicable Release Area ID#s** – Throughout the BRRP Interim Verification Form, indicate the ID# of all Areas of Concern (AOCs) / Release Areas (RAs) that achieved compliance with the specific RSR provision marked. Do not include the names of the AOCs/RAs, just the ID# (e.g., AOC-3, RA-7, etc.). The details of names and locations of the AOCs/RAs should be identified and described in the Remedial Action Report.

**Copies of Important Documents** - Certain provisions of the RSRs require Commissioner Approval, a notice, or an environmental land use restriction (ELUR). In general, the date of approval and recordation (for ELUR), if applicable, is required. Copies of these key documents are required because the verification relies on the existence of these documents.

Specifically for Commissioner Approvals, the dates of any approvals must be entered and a copy of the approval letter [only] must be attached to the BRRP Interim Verification Form. If the Commissioner's approval for use of a particular provision was used to achieve compliance but the BRRP Interim Verification Form does not include a copy of the Commissioner's approval letter, the Department will be compelled to conduct further review of the verification package, which may result in an official audit.

Specifically for ELURs, the date that the ELUR was recorded on the land records must be entered and a copy of the Certificate of Title page (with volume and page deed references and the date recorded) is be attached to the BRRP Interim Verification Form. **Please attach only the COT page.** This is required to ensure that all stakeholders know that the ELUR has indeed been recorded, and the specific RSR provision is therefore complete. If an ELUR was used to achieve compliance but the BRRP Interim Verification Form does not include a copy of the Certificate of Title, the Department will be compelled to conduct further review of the verification package, which may result in an official audit.

It is also important to provide the requested detail and information related to any financial surety mechanisms that have been established for Commissioner-Approved engineered controls.

### **Part I: Site Information**

*Property Name and Address* - Provide the name of the site by the full, legal company/firm name. Use the name that was indicated on the BRRP application submitted to the Commissioner of the Department of

Economic and Community Development. Provide the full and exact street address of the location of the site.

*Description in Tax Assessor's Office* - Provide the lot, block, and map identifiers, as listed in the Town's land records. If this does not correlate with the lot, block, map numbers indicated on the BRRP application, please explain.

*Acreage of Establishment* – Include the total acreage of all contiguous properties that are referred to as part of this site.

## **Part II: Verification**

The verification is rendered for a specific property accepted into the BRRP. In order to identify the specific property, provide the Rem# assigned to the BRRP property by the Department. Note: The applicable Rem# should be entered on each page of the BRRP Interim Verification Form.

The requirements to identify the selected groundwater remedy and attest to the supporting pre-requisites of a BRRP Interim Verification are located in Part III. B. Groundwater Remediation of the BRRP Interim Verification Form.

If applicable, check the box that indicates an ELUR has been approved by the commissioner and recorded on the land records.

The LEP is to provide his/her legal signature and license number, printed name, phone number, and email address. The LEP is to imprint or stamp his/her seal in the box provided.

## **Part III: Remediation of Environmental Media**

### **A. Standards for Soil Remediation**

It is presumed that, since groundwater remediation is ongoing, that a release to soils occurred.

1. Check this box if all detected concentrations of substances in soil were less than applicable Direct Exposure Criteria (DEC) and Pollutant Mobility Criteria (PMC) and remediation was not necessary.
2. If substances in soil at the site have ever exceeded criteria, check the applicable boxes for Criterion Exceeded, indicate the category of COCs, and indicate the measures used to achieve or demonstrate compliance.
3. **Application of Standards for Soil Remediation - RCSA 22a-133k-2** - The LEP should be able to mark the first box to indicate that the level of characterization of all releases has been adequately completed to understand the conditions at the site and to apply the RSRs. The second box is an acknowledgement that the Remedial Action Report details the specifics of characterization and compliance.

Tables 5 through 8 of Part III of the BRRP Interim Verification Form provide all options / provisions of the RSRs to demonstrate compliance and the means used to apply the provisions. Indicate in each table what provisions were used and at what Release Areas they were used at. Table 9 provides other provisions that are available to achieve compliance.

4. **Background Conditions - 22a-133k-2(a)(2)** – Pursuant to Section 22a-133k-2(a)(2) of the RSRs, notice is required to be submitted to the Commissioner if background conditions are applicable at the project site. Checking the box on this Form acts as said Notice. All subset checkboxes are prerequisites to demonstrate this condition exists, and all must apply. Therefore, all subset checkboxes must be marked to properly apply this provision. The Remedial Action Report must include discussion of the details that support use of this provision.
5. **Direct Exposure Criteria (DEC) - 22a-133k-2(a)1(A) and k-2(b)** – Check all applicable boxes to indicate the provisions that were used at the subject site to achieve or demonstrate compliance. Subset boxes must be appropriately marked to indicate the specific requirements to apply such provision were completed. Some subsets are “either-or” for application of that specific provision, and some subsets are “all-applicable”. *Ensure that the provisions are properly applied by reading the referenced RSR section next to the provision.* The details of how all marked provisions were used to achieve compliance should be explained in the Remedial Action Report.
6. **Compliance with DEC – 22a-133k-2(e)** – Indicate how the data was applied to demonstrate compliance using the provisions marked in Table 5, and at what Release Areas they were used at. The details of how and what data were used to achieve or demonstrate compliance should be explained in the Remedial Action Report.
7. **Pollutant Mobility Criteria (PMC) - 22a-133k-2(a)1(B) and k-2(c)** – Check all applicable boxes to indicate the provisions that were used at the subject site to achieve or demonstrate compliance. Subset boxes must be appropriately marked to indicate the specific requirements to apply such provision were completed. Some subsets are “either-or” for application of that specific provision, and some subsets are “all-applicable”. *Ensure that the provisions are properly applied by reading the referenced RSR section next to the provision.* Please note that the sub-sections that provide for ‘PMC not applicable’ are presented first in the sequencing of the PMC section of the BRRP Interim Verification Form, and do not follow the sequencing in the RSRs. The details of how all marked provisions were used to achieve compliance should be explained in the Remedial Action Report.
8. **Compliance with Pollutant Mobility – 22a-133k-2(e)(2)** - Indicate how the data was applied to demonstrate compliance using the provisions marked in Table 7, and at what Release Areas they were used at. The details of how and what data were used to achieve or demonstrate compliance should be explained in the Remedial Action Report.
9. **Other Provisions for Widespread Polluted Fill, Engineered Controls, NAPL, Soil Reuse, and the continued use of 500 mg/K for Lead - 22a-133k-2(f), k-1(g), k-2(g), and k-2(h)** - Check the applicable boxes of all provisions used at the subject site. Ensure that the provisions are properly applied by reading the referenced subparagraph next to the provision. Subset boxes must be checked to specify how the provisions are applied. The details of how all marked provisions were used to achieve compliance should be explained in the Remedial Action Report.

10. Specifically for Engineered Controls (ECs), recordation of an ELUR and financial surety are required. The RSRs provide for establishing the surety mechanism within one year of construction of the EC. If required, this mechanism must be in place before the verification is rendered. Indicate the type of surety mechanism and the date the surety mechanism was established and documented. A copy of the surety mechanism must be attached to the BRRP Interim Verification Form.

## **B. Groundwater Remediation**

The use of this BRRP Interim Verification Form indicates that groundwater has been impacted by a release and that a selected remedy for remediation of the groundwater is in operation.

1. Check the applicable boxes in this table to indicate the Criterion Exceeded, indicate the category of COCs, and indicate the selected remedy that is ongoing to achieve compliance. Identify the release area(s) at which the selected remedy is targeting.
2. **Characterization** - The LEP should be able to mark these two boxes to indicate he/she has an adequate understanding of the plume(s) that is being remediated and has sufficient information to understand the seasonal and dimensional conditions of the groundwater and the plume(s). Appropriate discussion of the groundwater investigation and the LEPs understanding of the hydrology and plume conditions is to be included in the BRRP Interim Remedial Action Report.
3. **Selected Remedy Requirements** - These boxes are pre-requisites to support the BRRP Interim Verification. If all boxes cannot be checked, then the BRRP Interim Verification is not valid. The details of marked boxes should be explained in the Remedial Action Report.
4. If there were no other plumes than the plume(s) with the selected remedy, check this box and skip to Section Part IV: Receptors.

If there were or are plumes other than the plume(s) with the selected remedy, but the plume(s) are in compliance with the remediation standards, check this box and complete the remainder of Part C.

## **C. Groundwater Remediation Standards**

1. If substances in groundwater at the site other than the plume(s) with the selected remedy have ever exceeded criteria, check the applicable boxes for Criterion Exceeded, indicate the category of COCs, and indicate the measures used to achieve compliance.
2. Complete this table if remedial measures were conducted to address Vapor Intrusion. Check the applicable boxes to indicate which measure was taken.
3. Check this box if the remediation criteria for groundwater do not apply due to "Incidental Sources". Complete the table to indicate the category of 'Incidental source'.
4. **Application of Groundwater Remediation Standards - RCSA 22a-133k-3** - The LEP should be able to mark the first two boxes to indicate he/she has an adequate understanding of all plumes and the seasonal and dimensional groundwater conditions. The next box confirms that

groundwater monitoring has been completed in accordance with 22a-133k-3(g). The subsequent boxes present the purpose of the groundwater monitoring program. Mark all boxes as appropriate. The last box is an acknowledgement that the Remedial Action Report details the specifics of characterization and compliance.

5. **Compliance with Criteria for Groundwater - 22a-133k-3(g)2(A)** – The LEP is to check each box to indicate that all pre-requisites to demonstrate compliance have been met. The last box is to be checked if an alternative means to demonstrate compliance had been approved by the Commissioner.
6. **Background Groundwater Quality - 22a-133k-3(a)(1)(B) and k-3(a)(2)** – Check all applicable boxes to indicate the provisions used at the subject site to achieve compliance. Ensure that the provisions are appropriately marked by reading the referenced RSR section next to the provision. The details of how all marked provisions were documented should be explained in the Remedial Action Report.
7. **Compliance with Background - 22a-133k-3(g)2(B)** – If Background groundwater quality is used as the goal for remediation of a groundwater plume, indicate how the data was applied to demonstrate compliance.
8. **Groundwater Protection Criteria – 22a-133k-3(a)2(A) and k-3(d)** - Check all applicable boxes to indicate that the GWPC was the applicable criteria and to indicate the provisions used at the subject site to achieve compliance with the GWPC. Subset boxes must be appropriately checked to specify how compliance was demonstrated. The details of how all marked provisions were used to achieve compliance should be explained in the Remedial Action Report.
9. **Compliance with GWPC - 22a-133k-3(g)2(B)** – If the groundwater protection criteria was the remedial goal for a plume, indicate how the data was applied to demonstrate compliance.
10. **Surface Water Protection Criteria - 22a-133k-3(a)1(A) and k-3(b)** - Check all applicable boxes to indicate the provisions used at the subject site to achieve compliance. Subset boxes must be appropriately checked to specify how compliance was demonstrated. The details of how all marked provisions were used to achieve compliance should be explained in the Remedial Action Report.
11. **Compliance with SWPC - 22a-133k-3(g)2(C)** – If the surface water protection criteria was a remedial goal for a plume, indicate how the data was applied to demonstrate compliance.
12. Check this box if there have been no detections of VOCs in groundwater. If this box can be marked, then skip to **C.16**.
13. If VOCs had been detected in groundwater, but the Volatilization Criteria (VoIC) is not applicable because the seasonal high groundwater elevation is greater than 15 feet beneath the ground surface or building. If this box can be marked, then skip to **C.16**.
14. **Volatilization Criteria – 22a-133k-3(a)(1)(A) and k-3(c), and k-3(f)(3)** - Check all applicable boxes to indicate the provisions used at the subject site to achieve compliance. Subset boxes must be appropriately checked to specify how compliance was demonstrated. The details of how all

marked provisions were used to achieve compliance should be explained in the Remedial Action Report. The Commissioner's approval is required to initiate measures to mitigate the migration of vapors into overlying structures. The dates of any approvals and a copy of the approval letter [only] are requested. Checking the box indicates that the copy is attached. If the Commissioner's approval was used, but the BRRP Interim Verification Form does not include a copy of the Commissioner's approval letter or indicates that the approval letter is not attached, typically the Department will be compelled to conduct further review of the verification package, which may result in an official audit.

15. **Compliance with VolC - 22a-133k-3(g)2(D)** – If the volatilization criteria is applicable at the site/release area/plume, indicate how the data was applied to demonstrate compliance.
16. **Other Provisions: "Policy on Upgradient Contamination - 8/28/97" and Technical Impracticability – 22a-133k-3(e)2** - Check applicable boxes to indicate the provisions used at the subject site to achieve compliance. The details of how all marked provisions were used to achieve compliance should be explained in the Remedial Action Report. If the Department's upgradient policy was used, the Department advises that the policy statement be reviewed prior to the application of the policy to ensure the policy has been properly applied.

#### **Part IV: Receptors**

Complete all information requested in this section of the BRRP Interim Verification Form. Details of the Environmental Setting and results of any sensitive receptor survey should be explained in the Remedial Action Report.

Check the applicable boxes to indicate if an ecological receptor was identified and/or evaluated. Details regarding any evaluation of potential ecological exposure pathways, where contaminants could affect aquatic and terrestrial life, as identified in the Conceptual Site Model (CSM), should be included in the Remedial Action Report.

If water supply wells had been impacted from any on-site release, indicate the number of supply wells impacted and check and complete the applicable boxes to indicate the measures instituted to provide a potable water supply. The details of how all marked provisions were used to achieve compliance should be explained in the Remedial Action Report.

#### **Part V: Certification**

Completion of this section of the BRRP Interim Verification Form is requested to document that the eligible party is cognizant that the verification is being rendered on their behalf and understands the intended applicability of the verification. This certification must be signed by a legally authorized and binding representative of the eligible party.

The fact that a selected groundwater remedy is ongoing mandates public notification of remediation pursuant to Section 22a-134a(i) of the CGS. Check this box to affirm that the public notification of remediation was published, and the documentation of such is included in the Remedial Action Report.